

LAW OFFICES OF MICHAEL G. BERGER
350 EAST 79TH STREET-36A
NEW YORK, NY 10075
917.400.2002
mberger@mberger.com

January 7, 2025

By ECF
Hon. J. Paul Oetken
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 1007

RE: Keep on Kicking Music, Inc., et al v.
Universal Music Group, Inc., et al
Docket no. 23-CV-4400 (JPO)(BCM)

Dear Judge Oetken:

On December 27, 2024, with the consent of Plaintiffs, I filed a motion to withdraw as counsel for Plaintiffs, and for Plaintiffs to be given 30 days after the granting of an order to obtain new counsel. Document 117. The Notice of Motion provided for opposition papers, if any, to be served by January 17, 2025, and reply papers to be served by January 24, 2025.

I write to inform the Court that there will be no opposition to my motion by any party. This was confirmed in the Consent Letter Motion/Joint Status Report sent on January 6, 2025, on behalf of all counsel, to Magistrate Judge Moses. Document 118, attached as an exhibit to this letter. That letter states in relevant part:

On December 27, 2024, Plaintiffs' counsel filed a motion to withdraw as counsel. None of the parties oppose that motion.

In light of Plaintiffs' consent and there being no opposition, I respectfully request that Your Honor consider my motion at this time.

Respectfully submitted,

Law Offices of Michael G. Berger

By /s/Michael G. Berger (MB2349)

Attorney for Plaintiffs
350 East 79th Street-36A
New York, NY 10075
917.400.2002
mberger@mberger.com

copies to all counsel by ECF/Plaintiffs by email